

### REMARKS/ARGUMENTS

Favorable reconsideration of this application, as presently amended and in light of the foregoing comments, is respectfully requested.

Claims 21-51 are pending in the application. Claims 21, 35, 40-45, 47, 48, 50 and 51 are amended; and Claims 22, 34, 36 and 49 are canceled by the present amendment. Support for the amended claims can be found in the original specification, claims and drawings.<sup>1</sup> No new matter is presented.

In the Office Action, Claims 21-25, 28, 35-39, 42 and 51 are rejected under 35 U.S.C. § 102(e) as anticipated by Patel et al. (U.S. Pat. 5,566,278, herein Patel); and Claims 26-27, 29-30, 35-34 and 45-50 are rejected under 35 U.S.C. § 103(a) as unpatentable over Patel.

In response to the rejection of Claims 21-25, 28, 35-39, 42 and 51 as anticipated by Patel, Applicant respectfully submits that amended independent Claims 21, 35 and 51 recite novel features clearly not taught or rendered obvious by the applied references.

Amended independent Claim 21, for example, recites a printer, comprising:

- a communication interface configured to receive a request from a computer remote from the printer;
- a memory, within the printer, configured to ***store a Java application for printing***;
- a processor configured to ***execute the Java application in response to the request, wherein a result of the executed Java application is output to an image forming device at the printer***; and
- the image forming device configured to output an image onto a recording medium in response to the result of the executed Java application.

Independent Claims 35 and 51, while directed to alternative embodiments, are amended to recite similar features. Accordingly, the remarks and arguments presented below are applicable to each of independent Claims 21, 35 and 51.

As disclosed in an exemplary embodiment at pp. 7-8, for example, of the specification, the printer is configured to receive a Java request for printing from a remote computer and

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<sup>1</sup> E.g., specification, pp. 7-8.

locally process the Java request at a Java application *in the printer*, to output an image at an image forming device at the printer. In other words, the printer runs a Java application *at the printer*.

Turning to the applied reference, Patel describes an object-oriented printing system that includes objects that provide query, data transfer, and control methods. Patel, however, fails to teach or suggest that his printer includes “a memory, within the printer, configured to *store a Java application for printing*, and a processor configured to *execute the Java application in response to the request, wherein a result of the executed Java application is output to an image forming device at the printer*,” as recited in amended independent Claim 21.

More particularly, col. 8, 1. 27 – col. 9, 1. 14 of Patel describes that a document is generated at an application program 402 of a computer 400, and the generated document is transmitted to a printer. More particularly, this portion of Patel describes that a printing interface 424 of a client computer 400 generates an entity called a document folio, which includes text, graphics or a combination of the two, formatted and arranged in a manner specified by the application program 402 of the client device. Once the document folio is processed by each of the other entities shown in Fig. 5 of the computer 400, the document is passed to the printer handler 510, which is also located in the computer 400 (see Fig. 4 of Patel).

Patel further describes that the printer handler 510 is a type of printer driver that controls and drives a specific printer; its purpose is to convert text and graphic information into printer readable form for any particular printer type. The printer handler contains a despooler program 516 which retrieves spooled data from an intermediate storage 522 and provides the information to an imaging engine. The imaging engine 532 converts the incoming data stream into the command signals which are necessary to drive the printing elements to produce the final printed document. The commands are provided to the actual print device indicated by box 528 for printing.

Thus, in Patel's system, the print data is processed at the same computer 400 at which it is originated using an application program 402, and is converted into specific command signals necessary to drive the printing elements to produce the final printed document before it is provided to the actual print device.

Therefore, the printer in Patel does not include "a memory, *within the printer*, configured to *store a Java application for printing*, a processor [of the printer] configured to *execute the Java application in response to the request, wherein a result of the executed Java application is output to an image forming device at the printer*, and the image forming device configured to *output an image onto a recording medium in response to the result of the executed Java application*," as recited in amended independent Claim 21.

Accordingly, Applicant respectfully requests that the rejection of Claims 21, 35 and 51 (and the claims that depend therefrom) under 35 U.S.C. § 102 and 35 U.S.C. § 103 be withdrawn.

Further, Applicant notes that Claims 31-33, 40, 41, 43 and 44 were not addressed in the Office Action. As these claims recite, *inter alia*, features directed to using Java as print language, Applicant respectfully submits that these claims also patentably define over Patel.

Consequently, in light of the foregoing comments, it is respectfully submitted that the invention defined by Claims 21-51 is patentably distinguishing over the applied references. The present application is therefore believed to be in condition for formal allowance and an early and favorable consideration of the application is therefore requested.

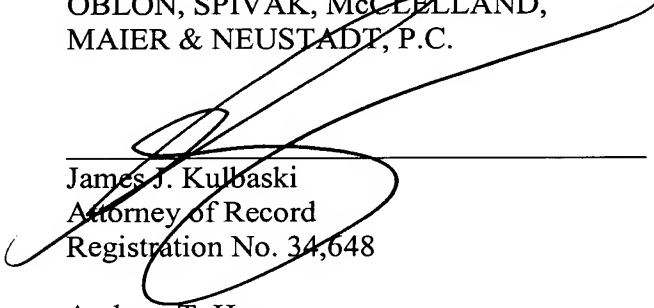
Respectfully submitted,

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